

# DEPARTMENT OF VETERANS AFFAIRS Health Care System 4150 Clement Street San Francisco, CA 94121

NUN 1 2 2017

In Reply Refer To: 662/138

Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
Department of Parks & Recreation
1725 23<sup>rd</sup> Street, Suite 100
Sacramento, CA 85816

Subject: Continued Section 106 Consultation for the Department of Veterans Affairs San Francisco Medical Center: Construction of Building 23 (Mental Health Research Annex, LRDP Sub-phase 1.13

Dear Ms. Polanco,

The purpose of this letter is to continue project-specific consultation for the San Francisco Veterans Affairs Health Care System (SFVAHCS) Building 23 project, Sub-Phase 1.13 within our Long Range Development Plan (LRDP), dated January 31, 2014. Following the stipulations of the Programmatic Agreement (PA) for the LRDP, we initiated consultation for the Building 23 project, under Review Categories A and C, by my letter dated May 8, 2015.

The initiation letter introduced the project with a brief description of the site and proposed project within the context of the LRDP, but stated that the project was still in the planning stage and therefore little detail beyond the general location and height of the proposed building could be provided. A response from the State Historic Preservation Officer, dated June 10, 2015, was received that stated it was important for the VA to be aware of the undertaking's potential effects on historic properties in the Fort Miley Military Reservation (FMMR) Historic District during design development of Building 23.

We are proceeding to Stipulation III. a/c. ii., as described in the *Programmatic Agreement* dated November 25, 2014. These steps state:

#### Review Category A: Sub-phases located within the SFVAHCS Historic District

- ii. Before completing Design Development, SFVAHCS will document the measures taken to avoid or minimize adverse effects on the SFVAHCS Historic District and address the SHPO's and GGNRA's comments.
  - 1. Documentation will include, but not be limited to:

- a. Written description of how the project applies the Secretary of the Interior's Standards for the Treatment of Historic Properties, including reference to how the Design Guidelines were applied.
- b. Written statement of whether the application of the Secretary of the Interior's Standards for the Treatment of Historic Properties achieved a minimization or avoidance of adverse effect on historic properties, and whether the subphase will contribute to the adverse effect on historic properties.
- c. Drawings including site plans, elevations, sections, and renderings illustrating the existing conditions and proposed project.
- 2. SFVAHCS will distribute the above documentation to Consulting Parties for a 30-day review and comment period. SFVAHCS will forward comments received within this period to the SHPO.

## Review Category C: Sub-phases located adjacent to the Fort Miley Military Reservation Historic District

- ii. Before completing Design Development, SFVAHCS will document the measures taken to avoid or minimize adverse effects on the FMMR Historic District and address the SHPO's and GGNRA's comments.
  - 1. Documentation will include, but not be limited to:
    - a. Written description of how the project applies the Secretary of the Interior's Standards for the Treatment of Historic Properties, including reference to how the Design Guidelines were applied.
    - b. Written statement of whether the application of the *Secretary of the Interior's Standards for the Treatment of Historic Properties* achieved a minimization or avoidance of adverse effect on historic properties, and whether the subphase will contribute to the adverse effect on historic properties.
    - c. Drawings including site plans, elevations, sections, and renderings illustrating the existing conditions and proposed project.
    - d. Summary of coordination efforts with GGNRA, including full copies of written comments received from GGNRA.
  - 2. SFVAHCS will distribute the above documentation to Consulting Parties for a 30-day review and comment period. SFVAHCS will forward comments received within this period to the SHPO.

#### Project-Level Description of Building 23

Building 23 would be located on the eastern edge of the campus/SFVAHCS Historic District and accessed via a walkway from Veterans Drive. The selected site is located immediately to the east of Buildings 8 and 9. The site borders the FMMR Historic District. The building will house mental health research laboratories and associated office spaces.

The design proposal for Building 23 is for an irregular-plan, three-story (12'-6" floor-to-floor heights) building, with flat roof. The height of the building (to the roof) rises to 37'-6". A parapet rises above the roof on all facades. The building contains a mechanical enclosure on the

roof that is set back from the exterior walls. The height and number of stories of Building 23 was established in the LRDP. Two recessed horizontal bands span all facades, demarcating the first story and the parapet from the second and third stories. The bands are metal inserts. The exterior walls are clad in stucco.

The primary façade of Building 23 faces west onto the campus core/historic district of SFVAHCS. The façade is designed to accommodate two factors: the viewshed/access to the site from Veterans Drive, and the irregularly shaped parcel. The building is partially visible via a corridor between Buildings 8 and 9 from Veterans Drive. The primary entrance is located at the center of the view corridor. The entrance is articulated by a protruding full height bay. The bay features the primary entrance at the ground level comprised of paired glazed doors under a flat canopy, and a two-story bank of windows above the doors. The entry bay features a three-sided parapet that rises above the parapet of the main building to 46'-6".

The shape of the parcel is irregular, with the southern end being narrower than the north end. Therefore, the west façade of Building 23 was designed with two full-height set-backs, moving from north to south (left to right). The west façade also features additional doors at the first floor, and punched anodized aluminum-frame windows at the second and third stories.

The north and south facades of Building 23 are similar in their design. They feature rows of anodized aluminum-frame windows at all three stories. The windows are set within a vertical bay (defined by structural columns) that is slightly recessed from the rest of the façade.

The east façade faces a wooded boundary line and the FMMR Historic District. The façade features five groupings of three or four anodized aluminum-frame windows at each story. Like the north and south boundaries, each window grouping is recessed within a vertical bay. The north, east, and west façades do not contain any doors.

#### Efforts taken to avoid or minimize impacts

The primary impact of the Building 23 project is the proposed demolition of Building 20, which is a contributor to the existing historic district. Building 20 is a former garage that is now used for storage. Its proposed demolition is included in LRDP sub-phase 1.8, along with the proposed construction of Building 24, and is therefore addressed under separate consultation.

Understanding that the new building will be constructed within the existing historic district, efforts were taken to avoid or minimize any additional impacts to the historic district by application of the SFVAHCS Historic District Design Guidelines (the Guidelines). The Guidelines were finalized in August 2015. They included two major design principles for new construction within the historic district. The primary goals for new construction were to avoid physical impacts to historic buildings and open spaces, and to avoid visual impacts to views. In sum, impacts were minimized or avoided through careful orientation of the new building with respect to extant historic buildings, and through the design of the building's height, massing, materials, and overall character with special attention paid to the east "rear" façade, which faces a wooded boundary and the FMMR Historic District. Specific design decisions that relate to these issues are outlined below. This discussion is based upon design documentation including architectural drawings dated August 17, 2016 provided by Polytech Associates, Inc., which are included as an attachment to this report (Appendix A).

The impact to the location has been minimized by adapting some of the characteristics of the historic buildings to Building 23, such as the flat roof, parapet, and punched windows on the west façade. Per guidance about Fenestration Patterns on page 41 of the Design Guidelines, efforts were made to create the impression of vertical fenestration on the north, south, and east façades through recessed bays. The entrance bay was centered within the view corridor from Veterans Drive, and features a two-story bank of windows above the doors, further reinforcing the vertical nature of the building's fenestration.

Per the Exterior Walls guideline on page 41, exterior cladding material will be stucco similar to the existing texture and color palette of the cladding found on the historic buildings.

The result of these design decisions is a fairly simple yet highly functional building that will not overshadow neighboring historic buildings. This is in keeping with the "general guidelines" presented on page 40 of the Design Guidelines, which states:

Simplified massing should be used for new infill construction in order to avoid competing with the historic resources.

Building 23 would be located within viewshed #9 as outlined on page 18 of the Design Guidelines, looking west from the FMMR Historic District and including a view of the tops of buildings 1 & 2 and the flagpole. Per the Design Guidelines:

New construction within this viewshed may be appropriate if the height does not interrupt views of Building 2 and the Flagpole, and if the design is compatible with the surrounding historic architecture, per the Secretary's Standards.

As described in the following discussion, the proposed Building 23 adheres to the Secretary's Standards and is compatible with the surrounding Historic District. Mechanical equipment will be located on the roof as opposed to the "rear" of the building (east façade) and will be minimally visible to the public circulation routes. Furthermore, the height of the building is below the heights of Building 1 (68') and Building 2 (111' to the top of the tower) and is not intended to block historic features from view. Lastly, the current vegetative screening will be maintained in the new design, so as to preserve the natural feeling and setting of both historic districts.

In sum, the demolition of Building 20 does contribute to the Adverse Effect on historic properties at SFVAHCS Historic District, as described in the LRDP. However, the application of the Design Guidelines and the Secretary of the Interior's Standards to the design for the new construction of Building 23 has avoided further impacts.

#### Secretary of the Interior's Standards for the Treatment of Historic Properties

The Design Guidelines were developed to support adherence to the Secretary of the Interior's Standards for the Treatment of Historic Properties (the Secretary's Standards). The Standards include Preservation, Rehabilitation, Restoration, and Reconstruction. For the Building 23 project, the Standards for Rehabilitation will be used to analyze the proposed design for compatibility with SFVAHCS Historic District. The following discussion of the project's adherence to the Secretary's Standards builds upon the brief analysis that was provided in

previous consultation, and includes applicable references to specific concepts contained within the Design Guidelines that informed the development of the project design.

**Rehabilitation Standard 1:** A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.

The existing and historical uses of the SFVAHCS have been a combination of offices, labs and medical facilities supporting the needs of veterans. Research has historically been part of the mission of the Veterans Health Administration. The proposed project would construct a new research facility that would support the significance of the SFVAHCS Historic District as a medical facility for veterans through expanding our understanding of the role mental health plays in the overall health of veterans. Therefore, the property will be used in the spirit the district has been used historically.

**Rehabilitation Standard 2**: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize the property will be avoided.

As described in its National Register nomination, the SFVAHCS Historic District is significant for its 1) technologically advanced reinforced concrete structures, 2) Mayan Art Deco architectural detailing, and 3) ongoing use as a medical and research facility.

As the LRDP outlines, the majority of the contributing resources within the historic district will be retained and preserved. Demolition of Building 20, however, will result in the loss of one contributing building in the historic district. Despite the loss of this building, the district will still be able to convey its significance as a historic resource.

Overall, the proposed design of Building 23 reflects the character of the district by conforming to the general height and massing precedent set by other contributing buildings in the SFVAHCS Historic District. Contributing buildings within the district currently span one floor in height to seven floors in height. Building 23 would rise to three floors, falling well within the spectrum of heights already established on the campus. Additionally, the building would be built on a north-south axis, with the primary facade (containing entrances) facing west. Therefore, it would relate spatially to the SFVAHCS Historic District in much the same way that Building 20 did. Furthermore, adaptation of historical design concepts (per the Design Guidelines) has resulted in a building that reflects the fenestration and color/materials palates of neighboring historic buildings.

In sum, although the removal of Building 20 would have an impact on the district, the district itself would still be able to convey its significance. The new construction as proposed will not impact the historic character of the SFVAHCS Historic District to an extent that the District's ability to express its historic significance would be impaired.

**Rehabilitation Standard 3**: Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historical properties, will not be undertaken.

The proposed project would not create a false sense of history, nor will it add conjectural historical features to Building 23. The proposed project would use a materials palette (primarily stucco) that is compatible with the local environment while enabling modern research and medical facility needs. Following the direction provided on pages 39 and 40 of the Design Guidelines, the proposed design references characteristics found in the historic district (such as punched windows and basic, stepped massing), while utilizing a modern aesthetic with minimal ornamentation that will be identifiable as new construction. It will be recognized as a physical record of its time, place, and use.

**Rehabilitation Standard 4**: Changes to a property that have acquired significance in their own right will be retained and preserved.

The proposed project would not remove or alter character-defining features on any contributing buildings other than Building 20, which is addressed under separate consultation.

**Rehabilitation Standard 5**: Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

The proposed project will not affect distinctive materials or construction techniques that characterize historic resources within the SFVAHCS Historic District. Apart from the demolition of Building 20, the proposed project will not affect any nearby contributing resources to the historic district such that their materials, features, finishes, and construction techniques would be impacted.

**Rehabilitation Standard 6**: Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

The proposed project does not involve the replacement of deteriorated or missing historic features either at the project site or within the SFVAHCS Historic District.

**Rehabilitation Standard** 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

The proposed project does not entail the cleaning or repair of historic materials.

**Rehabilitation Standard 8**: Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measure will be undertaken.

The FOE for the LRDP, dated June 6, 2013, determined that no archaeological resources are known within the SFVAHCS campus.

**Rehabilitation Standard 9**: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale, proportion, and massing to protect the integrity of the property and environment.

The proposed project would include new construction that would be distinctive from existing buildings in the vicinity, but compatible with the historic materials, features, size, scale, proportion, and massing of the contributing buildings within the Historic District. Compatibility would be achieved through its relatively basic massing that includes a stepped-up parapet tower, per page 40 of the Design Guidelines; a flat roof, per page 41; windows arranged in recessed, vertical channels that accentuate the vertical dimension of the building, per page 41; and use of stucco cladding, per page 41. The building will be differentiated from historic buildings within the Historic District and will not employ faux-historicist features.

The proposed project would include materials and features that will not distract from those that characterize the district. Additionally, the design of the proposed project has been completed in a way that maintains the spatial relationships between the site and the district.

**Rehabilitation Standard 10**: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The proposed project includes the demolition of an existing historic building and construction of a new building within the SFVAHCS Historic District. As discussed under Standards 1 through 9, the project is designed in a manner that minimizes its impact on the historic district's ability to retain and express its historic character and historic significance. Because of this minimized impact, whether the new project, after it is constructed, is retained or removed in the future, neither condition would impair the essential form and integrity of the SFVAHCS Historic District.

#### Summary of coordination efforts with GGRNA

During the design development process, representatives from SFVAHCS solicited input from GGNRA on the proposed design of Building 23 and its potential impact on the FMMR Historic District. As a result of this coordination, increased attention has been paid to treatments at the rear of the building, which faces the SFVAHCS's shared boundary with the FMMR Historic District. The proposed fenestration at this façade features extensive glazing, thus avoiding a blank or minimally decorated wall facing the FMMR Historic District. Mechanical equipment will not be located at the rear of the building, but rather will be placed on the roof in order to lessen its visibility.

GGNRA provided a letter to SFVAHCS on December 16, 2015. This letter, included as an attachment to this report (Appendix B), stated GGNRA's preference that Building 23 be developed as a two-story building rather than as a three-story building. GGNRA stated that a two-story building would be most compatible with the character of buildings located within the SFVAHCS Historic District that abut the FMMR Historic District. GGNRA also supported exterior cladding materials, window treatments, and rooftop mechanical equipment that would be similar to the proposed design for Building 24 on the adjacent site. GGNRA also recommended that the exterior sidewalk to the rear of Building 23 be designed to connect to a similar sidewalk to the rear of Building 24, and that the design not preclude the introduction of a new pedestrian entrance into the park at this location in the future. Additionally, GGNRA requested to review architectural plans if SFVA proposes a retaining wall and fence to the east of Building 23 to continue these features from the east of Building 24.

SFVAHCS has taken these comments into consideration, and the proposed design responds to programmatic needs as well as adheres to the Secretary's Standards and the Design Guidelines, as specified in the Programmatic Agreement.

Summary of analysis and findings

Phase 1.13 of the LRDP will result in a NET adverse effect due to new construction proposed on the site of a building that contributes to the SFVAHCS Historic District. However, Building 23 has been designed in a sensitive manner, using the Design Guidelines and Secretary's Standards and will not further contribute to the adverse effect of the LRDP.

We look forward to hearing from you regarding the design of Building 23. If you have questions or comments about this project, please contact our facilities POC Robin Flanagan via email at Robin.Flanagan@va.gov or at (415) 750-2049.

Sincerely,

Bonnie S. Graham, MBA

Health Care Systems Director

**Enclosures** 

Appendices A, B, C:

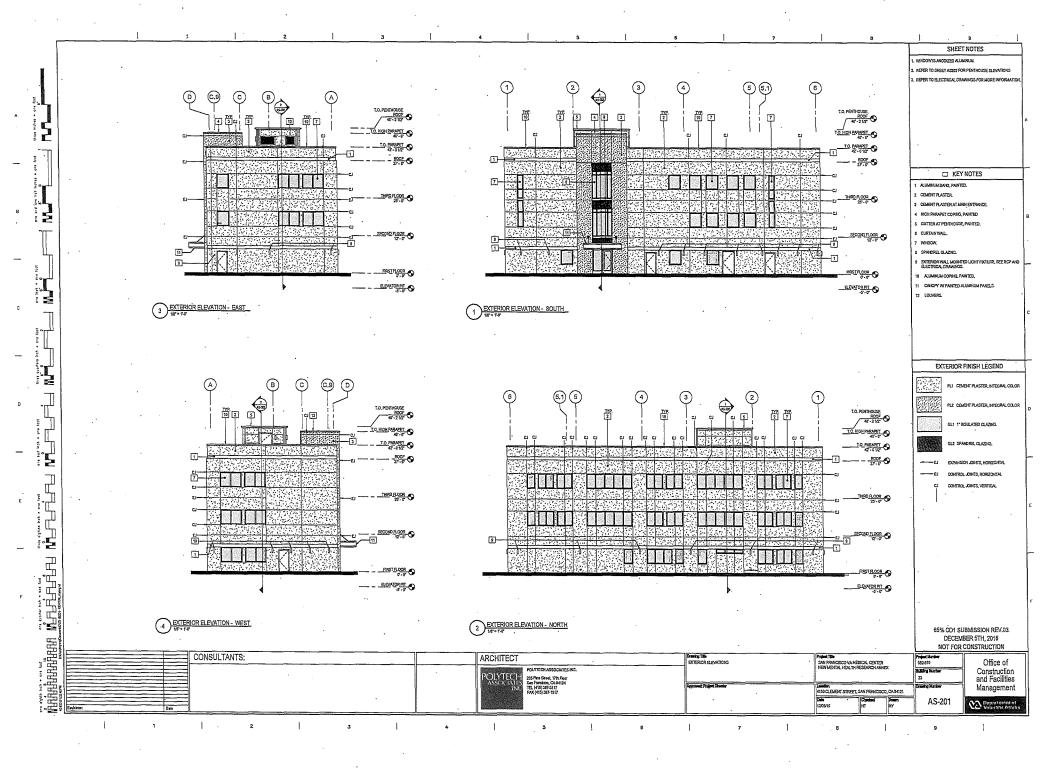
A. Building 23 Design Development Drawings - Site Plan, Elevations, and Sections

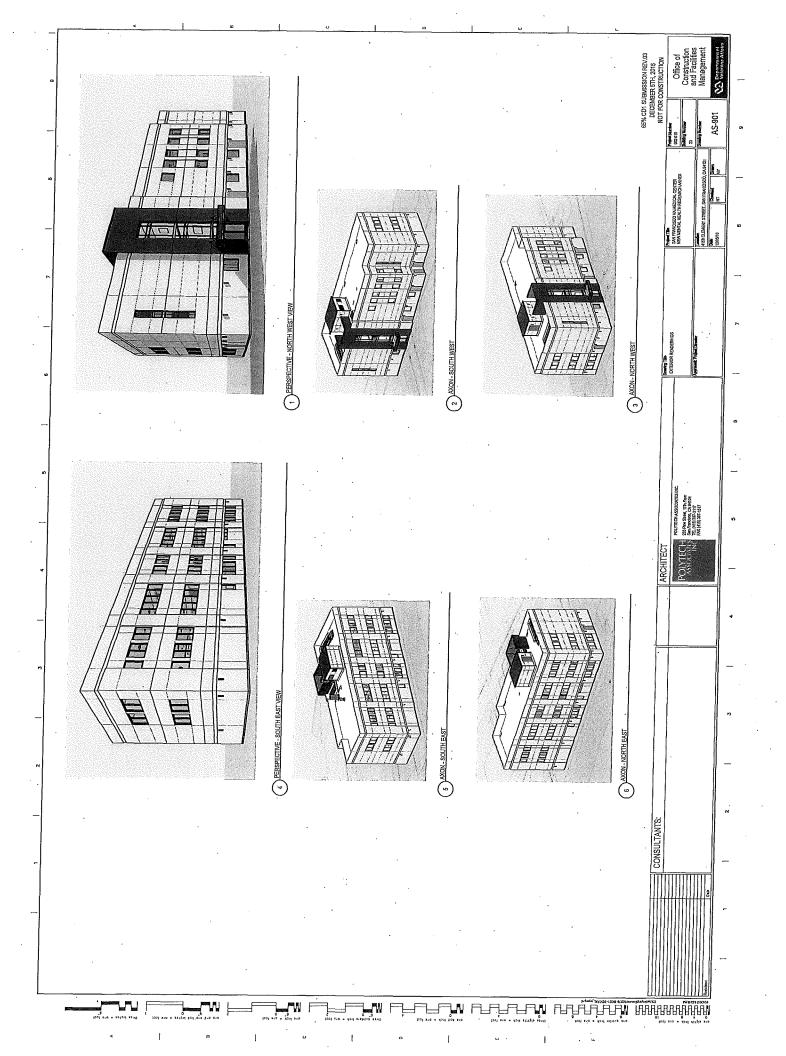
B. Written comments from GGNRA

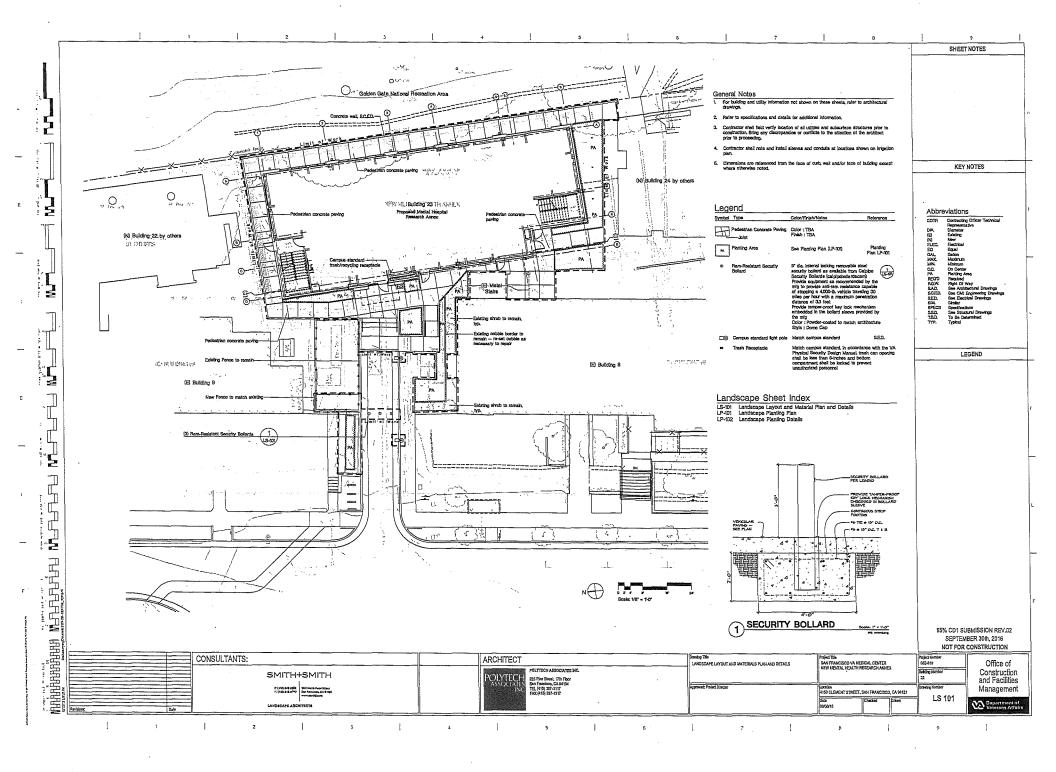
Cc:

GGNRA

**ACHP** 









### United States Department of the Interior

#### NATIONAL PARK SERVICE

Golden Gate National Recreation Area Fort Mason, San Francisco, California 94123

IN REPLY REFER TO

H4217 (GOGA-CRMM)

DEC 1 6 2015

Bonnie Graham, MBA Medical Center Director Attn: Robin Flanagan San Francisco VA Medical Center 4150 Clement Street San Francisco, CA 94121

Re: Response to 662/138 Section 106 Consultation for the Department of Veterans Affairs San Francisco Medical Center: Construction of Building 23 (Mental Health Research Annex, Sub-phase 1.13)

Dear Ms. Graham: Famul

The National Park Service (NPS) appreciates the extension of our opportunity to comment on the San Francisco Veterans Administration Medical Center (SFVAMC) Building 23 (Mental Health Research Annex) as submitted to the SHPO as enclosure Appendix B to the Initiation of Consultation letter under the new Veterans Administration Programmatic Agreement (PA). It was helpful to have met informally last June, to go over early conceptual designs of the building.

Now that the VA's Long Range Development Plan (LRDP) Record of Decision (ROD) has been signed, we look for assurances that the design of Building 23 will be consistent with the mitigations outlined in the ROD, specifically with the Historic District Design Guidelines, the Historic Landscape Study, the Public Interpretive Program, and the Historic Preservation Treatment and Maintenance Plan. In that spirit, of the three conceptual design options presented in your proposal, the NPS prefers Option 2 because it is a two-story building. A three-story building is taller than all but one of the adjacent buildings on the side of the campus that abuts the Fort Miley Military Reservation (FMMR) Historic District, and is therefore, we feel, inconsistent with Secretary's Standard 2 because it alters the spaces that characterize the property, and with Standard 9 because it is incompatible with the massing, size and scale of the other buildings along our mutual property line. The NPS acknowledges the substantial response of the SFVAMC to our concerns about the size of proposed adjacent new Building 24 by redesigning the building as two stories instead of three and hopes to see Building 23 treated in similar fashion.

The NPS supports the idea of a sidewalk running between the east side of Building 23 and the boundary with the park. We ask that this sidewalk connect with the similar sidewalk planned for the east side of Building 24, and that the Building 23 sidewalk not preclude the possibility of a new park pedestrian entrance, possibly between Buildings 22 and 23. If the construction of Building 23 will include an extension of the new concrete retaining wall and fence proposed for the east side of Building 24, then

please provide the Park with architectural plans and illustrations that include a view of the fence from the adjacent NPS property, once designed. We ask that you avoid any excavation on Park property.

When designs are further developed, we hope to see a design treatment consistent with that of the adjacent Building 24, such as a similar cladding, vertical inset window treatment with opaque spandrel panels, window frames and glazing that allow minimal night light into the park, and rooftop mechanical equipment shielded from view by a parapet and buffered against sound bleed.

As mentioned consistently in the past, the NPS requests that the VA assist with vegetative screening on our property to assist in minimizing visuals impacts from the FMMR Historic District of the new construction Buildings 22, 23 and 24, and we hope to have acknowledgement of this request.

We appreciate the improved communications between our two agencies as we both work to meet our missions, and look forward to continuing our involvement in SFVAMC projects affecting the Fort Miley Military Reservation Historic District, and to receiving the next stage of design development drawings for this Sub-phase 1.13 of the SFVAMC's LRDP. If you have any questions on these matters please address them to Bob Holloway of the park staff at (415) 561-4976 and/or bob\_holloway@nps.gov.

Sincerely,

Christine Lehnertz General Superintendent

cc: California State Historic Preservation Officer